

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE

JOANN INC., et al.,

Debtors.

Chapter 11

Case No. 25-10068-CTG

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Red Mountain Asset Fund I, LLC, a Delaware limited liability company (“Red Mountain”), and Smart Cienega SPE, LLC, a California limited liability company (“Smart Cienega”), by and through their counsel, Ervin Cohen & Jessup LLP hereby request pursuant to Bankruptcy Code § 1009(b) and Bankruptcy Rules 2002, 3017, 4001, and 9007 that notice of all matters which may come before the Court be given as follows:

Red Mountain Asset Fund I, LLC  
Smart Cienega SPE, LLC  
c/o Byron Z. Moldo  
Ervin Cohen & Jessup LLP  
9401 Wilshire Boulevard, 12<sup>th</sup> Floor  
Beverly Hills, CA 90212

PLEASE TAKE FURTHER NOTICE that Red Mountain and Smart Cienega hereby request that they be included on the official mailing matrix and all limited notice or service lists authorized by the Court in this Case.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, complaints, demands, replies, answers, hearings, motions, petitions, requests, operating reports, plans of reorganization, disclosure statements, including all amendments of any of the foregoing and any other documents brought before the Court in this case, whether formal

or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, email, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Red Mountain or Smart Cienega's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable in any case, controversy or adversary proceeding; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Red Mountain or Smart Cienega is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: March 20, 2024

ERVIN COHEN & JESSUP LLP

By: /s/ Byron Z. Moldo

BYRON Z. MOLDO (CA SBN 109652)

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Attorneys for Red Mountain Asset Fund I, LLC, a

Delaware limited liability company and Smart

Cienega SPE, a California limited liability company

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on January 16, 2025, via ECF Noticing to the persons of record.

By: /s/ Byron Z. Moldo  
Byron Z. Moldo